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October 12, 2023

Via ECF

Hon. Valerie Figueredo
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States ex rel. Bassan v. Omnicare, Inc.*, No. 15 Civ. 4179 (CM) (VF)

Dear Judge Figueredo:

Under Rule I.g of Your Honor's Individual Practices and the Protective Order in this matter, we write to request the Court's permission to file under seal the letter objecting to the Court's September 21, 2023 order requiring production of documents from Defendants' fourth *in camera* binder. Defendants further request permission to file *ex parte* and *in camera* the exhibit to that letter, which reflects information protected by the attorney-client privilege.

The Protective Order permits a party to request filing under seal confidential documents. Dkt. 102 ¶ 19. In following the Protective Order's process, Defendants request that the Court grant leave to file under seal the abovementioned letter, which discusses Defendants' confidential documents. *See id.*

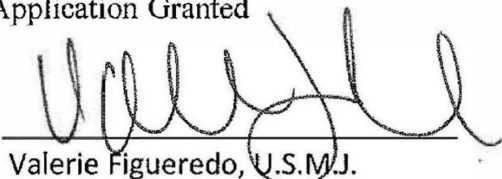
We appreciate the Court's consideration.

Sincerely,

s/s

Daniel Boger

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: October 16, 2023

The Clerk of Court is respectfully directed to terminate the motions at ECF Nos. 358 and 359.